

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ERIC ROMERO DE LEON

DEBTORS

CASE NO 13-06792-BKT

CHAPTER 13

**DEBTORS' MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COMES, ERIC ROMERO DE LEON, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated May 19, 2015, herewith and attached to this motion.

2. This Plan modification is filed to increase the length of time from 18 months to 60 months in which the debtor will pay the proposed lump sum payment of \$18,000.00. The debtor needs to extend the time to pay the lump sum, because he has not received any proceeds from the claim for salary since the case is still pending.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

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Case no. 13-06792-BKT

Post confirmation modification of chapter 13 Plan

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 19th day of May, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONERS
PO BOX 193677
SAN JUAN PR 00919-3677
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **3:13-bk-6792**

ROMERO DE LEON, ERIC

Chapter **13**

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: **5/19/2015**

☐ AMENDED PLAN DATED: _____

☐ PRE ☒ POST-CONFIRMATION

Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ **300.00** x **57** = \$ **17,100.00**
\$ **540.00** x **3** = \$ **1,620.00**
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____

TOTAL: \$ **18,720.00**

Additional Payments:

\$ **18,000.00** to be paid as a LUMP SUM
within **60 months** with proceeds to come from:

☐ Sale of Property identified as follows:

☒ Other:

Claim listed in Schedule B

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ **36,720.00**

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ **2,761.00**

Signed: 
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. **SCOTIABANK** Cr. _____ Cr. _____
Claim 4-1 # _____ # _____
\$ **3,110.11** \$ _____ \$ _____

2. ☐ Trustee pays IN FULL Secured Claims:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

SCOTIABANK

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____

☐ Paid 100% / ☐ Other: _____

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)

Priority: \$11,424.

Debtor assume lease agreement with Eduardo Diaz Vazquez; Pedro Clausell.

Any proceeds of debtor cause of action listed on Schedule B received during the term of the Plan either by judgment or settlement shall be paid into the plan as a lump sum. The LV will be reassessed upon judgment or settlement.

* "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."

Late filed claims filed by creditors will receive no distribution. "Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank. Debtor reserves the right to object claims after plan confirmation.

Attorney for Debtor **R. Figueroa Carrasquillo Law Office**

Phone: **(787) 744-7699**

AMENDED CHAPTER 13 PAYMENT PLAN

IN RE ROMERO DE LEON, ERIC

Case No. 3:13-bk-6792

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

	Cr	#	\$
Executory Contracts - Assumed:	Eduardo Diaz Vazque Pedro Clausell		

Label Matrix for local noticing
0104-3
Case 13-06792-BKT13
District of Puerto Rico
Old San Juan
Tue May 19 10:18:12 AST 2015

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

ASOCIACION EMPLEADOS ELA
PO BOX 364508
SAN JUAN, PR 00936-4508

ASUME
PO BOX 11218
SAN JUAN, PR 00910-2318

AT&T Mobility Puerto Rico, Inc
& AT&T Services, Inc
Karen Cavagnaro, Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

CENTRO GOMAS VILLA DEL REY
VILLA DEL REY FF7 11 STREET
CAGUAS, PR 00727-6827

ENHANCED RECOVERY CORPORATION
8014 BAYBERRY RD
JACKSONVILLE, FL 32256-7412

HOSPITAL MENONITA
BOX 373130
CAYEY, PR 00737

MARIA V IRIZARRY CENTENO
BOX 692
AIBONITO, PR 00705-0692

ERIC ROMERO DE LEON
PO BOX 6951
CAGUAS, PR 00726-6951

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

AEE
PO BOX 363508
SAN JUAN PR 00936 3508

ASUME
MARIA V IRIZARRY CENTENO
PO BOX 11218
SAN JUAN, PR 00910-2318

AT&T
5407 ANDREWS HWY
MIDLAND, TX 79706-2851

BANCO POPULAR DE PR
PO BOX 70100
SAN JUAN, PR 00936-8100

DORAL BANK
1451 AVE FD ROOSEVELT
SAN JUAN, PR 00920-2717

ENRIQUE J LEON MALAVE
C/O JUAN E MEDINA QUINTANA
VILLA GRILLASCA 2140 BLVD LUIS A FERRE
PONCE, PR 00717-0722

LCDA NILDA M RAMON APONTE
HACIENDA SAN JOSE 577 VIA GUAYABAL
CAGUAS, PR 00727-3064

ORIENTAL BANK (BBVA)
PO BOX 191017
SAN JUAN, PR 00919-1017

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

SCOTIABANK DE PUERTO RICO
CARDONA JIMENEZ LAW OFFICE PSC
PO BOX 9023593
SAN JUAN, PR 00902-3593

AFNI
ATT
PO BOX 3517
BLOOMINGTON, IL 61702-3517

ASUME
NILDA M RAMON APONTE
PO BOX 11218
SAN JUAN, PR 00910-2318

AT&T
PO BOX 192830
SAN JUAN, PR 00919-2830

BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PR 00936-6818

EMMA L ORTIZ TIRADO
HC 45 BOX 9721
CAYEY PUERTO RICO 00736-9606

Eduardo Diaz Vazquez
Gurabo, PR 00778-0000

LCDO JUAN E MEDINA QUINTANA
2140 LAS AMERICAS
PONCE, PR 00717-0750

SCOTIABANK
PO BOX 362649
SAN JUAN, PR 00936-2649

MONSITA LECAROS ARIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
ST CLOUD, MN 56302-9617

(d)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
ST CLOUD MN 56302

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ASUME-EMMA L. ORTIZ TIRADO PO BOX 71316 S

(d)SCOTIABANK DE PUERTO RICO
CARDONA-JIMENEZ LAW OFFICE, PSC
P.O. BOX 9023593
SAN JUAN, PR 00902-3593

End of Label Matrix	
Mailable recipients	30
Bypassed recipients	2
Total	32